

EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA)

Name of Function under consideration:	Parking Enforcement
Is this Function 'Major', 'Minor yet likely to have a major impact' or 'Neither'	Major
Date(s) of completing the EqIAA:	28 December 2012
Name and job title(s) of person(s) completing the EqIAA:	Mark Pullin, Strong, Safer Communities Manager 8480

SECTION 1 – INTRODUCTORY INFORMATION

What is the main purpose of the Function?	To enforce the parking and waiting restrictions with the District of South Gloucestershire.
List the main activities of the Function:	<p>A team of Civil Enforcement Officers patrol the waiting restrictions on South Gloucestershire roads and in car parks ensuring that vehicles are parked legally, within bays, for appropriate time periods and where appropriate in accordance with the residents parking scheme. If there are breaches then a Penalty Charge Notice is issued.</p> <p>The team also responds to challenges and legal appeals following the issue of Penalty Charge Notices. These are different officers to those that issue the Penalty Charge Notices and this team also administer resident parking schemes.</p>
Who are the main beneficiaries of the Function?	Residents and Businesses in South Gloucestershire as well as visitors to the area.
How is the overall success of the Function measured?	<p>Performance management systems are being developed but focus on the number of 'hot-spot' areas that are visited on a daily basis. The number of Penalty Charge Notices that are successfully appealed against are also monitored.</p> <p>Responses to consumers within 5 days of their initial enquiry is the primary target for the appeals team.</p>
What equality monitoring systems are in place to carry out regular checks on the effects of the Function on equality groups?	<p>There are currently no equality monitoring systems in place but these will be developed in conjunction with customer satisfaction monitoring (see Section 4).</p> <p>The service has consulted widely on an updated enforcement policy. This has included talks to two disability groups who have raised concerns about the need to enforce:</p> <ul style="list-style-type: none"> • On dropped kerbs as parking there causes significant problems for them. • On pavements as this can prevent them being able to get around. • Not to enforce the weight restrictions in car parks as this would disproportionately affect accessible vehicles as they tend to be heavier than domestic vehicles.
What are your equality related performance indicators/measure of success for this Function?	There are currently no equality monitoring systems in place but these will be developed in conjunction with customer satisfaction monitoring (see Section 4).

SECTION 2 – CONSULTATION AND RESEARCH

The council held a consultation which ran from 24 September 2012 until 14 December 2012.

The draft policy was available online, from libraries and one stop shops for comment.

The consultation was widely promoted and information was sent to the following key stakeholders:

- All councillors
- All parish & town councils
- All safer stronger groups
- All business groups
- All libraries
- All one stop shops
- South Gloucestershire Equalities Forum
- Taxi Liaison Group
- Transport groups and motoring organisations
- Police and emergency services
- South Gloucestershire Disability Network and a range of groups representing older people and people with disabilities
- Voluntary and community sector in South Gloucestershire

In total 59 survey responses were received and 22 letters and emails in response to this consultation.

Whilst these responses are not representative of service users or the general public, they provide an indication of issues to help inform decision making.

In respect of analysing equalities impacts, an overview of the consultation results are shown below.

Full consultation results are shown in Appendix 1.

Equalities analysis of responses to Parking Enforcement Policy consultation

	Overall	Male	Female	Under 45	45 to 65	Over 65	White British	Other ethnicity / prefer not to say	Disabled	Non disabled
Base	59	39	13	12	22	16	45	11	7	41
Introduction of parking enforcement vehicles to enforce restrictions	60.7%	63.2%	61.6%	50.0%	68.2%	68.8%	66.6%	30.0%	100.0%	58.5%
Introduction of body worn audio visual equipment to protect Civil Enforcement Officers	72.2%	72.9%	83.3%	75.0%	76.2%	75.1%	79.6%	33.3%	85.7%	76.9%
The use of warning notices for a limited period following the introduction of new or changed parking restrictions, after which Penalty Charge Notices would be issued	92.9%	94.7%	84.7%	100.0%	86.3%	93.8%	91.1%	100.0%	100.0%	90.2%
Tolerance will not be given to any vehicles found parked on single or double yellow lines unless there is a valid reason for parking there	80.4%	86.8%	77.0%	83.4%	86.4%	87.5%	84.5%	70.0%	100.0%	83.0%
Issue Penalty Charge Notices for blocking or parking across dropped kerbs for residents driveways	74.6%	78.4%	84.7%	58.3%	80.9%	93.8%	81.8%	50.0%	100.0%	77.5%
Issue Penalty Charge Notices for parking away from the kerb	50.0%	60.5%	30.8%	50.0%	54.5%	50.0%	51.1%	50.0%	71.5%	48.8%
Issue Penalty Charge Notices for parking on the pavement	74.1%	72.9%	77.0%	66.7%	77.2%	73.4%	72.1%	80.0%	85.7%	70.0%
Introduce more regular and systematic enforcement of weight restrictions in car parks	50.0%	52.6%	46.2%	41.7%	54.5%	56.3%	51.1%	50.0%	85.8%	41.5%
Adopt the power to remove vehicles in exceptional circumstances	80.0%	86.8%	61.6%	75.0%	86.4%	81.3%	81.8%	70.0%	100.0%	75.6%
Overall Parking Enforcement Strategy	70.9%	78.3%	69.3%	63.7%	72.8%	87.5%	79.6%	30.0%	100.0%	72.5%

% indicates number of respondents either strongly agreeing or tending to agree with the statement

Prior to the policy consultation we reviewed the legislation and operational guidance from the Department For Transport to ensure compliance. A request was made to all civil parking authorities in England for information and advice on introducing a parking enforcement car and the responses informed the proposals.

SECTION 3 - IDENTIFICATION AND ANALYSIS OF EQUALITIES ISSUES AND IMPACTS

In analysing the impact of the proposed changes to the Parking Enforcement Policy, a robust approach is to take each issue in turn and examine the associated consultation and research outcomes in order to inform an EqIAA outcome. All 9 of the protected characteristic groups as set out in the Equality Act 2010 have been considered.

Proposal	Equalities Analysis
<i>Introduction of parking enforcement vehicles to enforce restrictions</i>	<p>The consultation results show that fewer 'Under 45s' and 'Non White British' people were in agreement with this proposal. However, overall, a significant 60.7% of consultation respondents strongly agreed or tended to agree.</p> <p>There is no evidence emerging, from either consultation or research conducted, to indicate that the introduction of parking enforcement vehicles would have any negative impact upon any protected characteristic group.</p>
<i>Introduction of body worn audio visual equipment to protect Civil Enforcement Officers</i>	<p>The consultation results show that fewer 'Non-White British' people were in agreement with this proposal. However, overall, a significant 72.2% of consultation respondents strongly agreed or tended to agree.</p> <p>There is no evidence emerging, from either consultation or research conducted, to indicate that the introduction of body worn audio visual equipment would have any negative impact upon any protected characteristic group. Specific written responses to the consultation were in favour of this, citing the importance of the council providing adequate protection for CEOs.</p>
<i>The use of warning notices for a limited period following the introduction of new or changed parking restrictions, after which Penalty Charge Notices would be issued</i>	<p>The consultation results show that fewer 'Females' and '45s – 65s' were in agreement with this proposal. However, overall, a significant 92.9% of consultation respondents strongly agreed or tended to agree.</p> <p>The use of written notices may in some circumstances present barriers for people who have limited English language or certain sensory impairments. However, in this instance, 100% of 'Non White British' and 'Disabled' consultees were in favour of this proposal.</p> <p>There is no evidence emerging, from either consultation or research conducted, to indicate that the use of warning notices for a limited period following the introduction of new or changed parking restrictions would have any negative impact upon any protected characteristic group.</p>
<i>Tolerance will not be given to any vehicles found parked on single or double yellow lines unless there is a valid reason for parking there</i>	<p>The consultation results show that fewer 'Females' and 'Non White British' people were in agreement with this proposal. However, overall, a significant 80.4% of consultation respondents strongly agreed or tended to agree.</p> <p>There is no evidence emerging, from either consultation or research conducted, to indicate that this proposal would have any negative impact upon any protected characteristic group.</p> <p>Numerous specific consultation responses stated the importance of this, in particular around schools which would result in a positive impact on the road safety of younger people of school age.</p>

Proposal	Equalities Analysis
<p><i>Issue Penalty Charge Notices for blocking or parking across dropped kerbs for residents driveways</i></p>	<p>The consultation results show that fewer 'Under 45s' and 'Non White British' people were in agreement with this proposal. However, overall, a significant 74.6% of consultation respondents strongly agreed or tended to agree.</p> <p>Consultation with disability groups has specifically raised the issue that dropped kerbs are of high importance for many Disabled People who would rely on these for access, road crossing points etc. Enforcement of this would have a positive impact for many Disabled People as well as parents with pushchairs who are proportionately more likely to be Female.</p> <p>There is no evidence emerging, from either consultation or research conducted, to indicate that this proposal would have any negative impact upon any protected characteristic group.</p>
<p><i>Issue Penalty Charge Notices for parking away from the kerb</i></p>	<p>The consultation results show that fewer 'Females' were in agreement with this proposal. A high number of 'Males' and 'Disabled' People were in agreement with this proposal. 50% of consultation respondents strongly agreed or tended to agree.</p> <p>There is no evidence emerging, from either consultation or research conducted, to indicate that this proposal would have any negative impact upon any protected characteristic group.</p>
<p><i>Issue Penalty Charge Notices for parking on the pavement</i></p>	<p>The consultation results show that fewer 'Under 45s' were in agreement with this proposal. A high number of 'Disabled' People were in agreement with this proposal. 74.1% of consultation respondents strongly agreed or tended to agree.</p> <p>Consultation with disability groups has specifically raised the issue that parking on pavements can cause significant barriers for many Disabled People. Enforcement of this would have a positive impact for many Disabled People as well as parents with pushchairs who are proportionately more likely to be Female.</p> <p>There is no evidence emerging, from either consultation or research conducted, to indicate that this proposal would have any negative impact upon any protected characteristic group.</p>
<p><i>Introduce more regular and systematic enforcement of weight restrictions in car parks</i></p>	<p>The consultation results show that fewer 'Under 45s' and 'Non-Disabled' People were in agreement with this proposal. 50% of consultation respondents strongly agreed or tended to agree.</p> <p>Consultation with disability groups has specifically raised the issue of not enforcing weight restrictions in car parks as this would disproportionately affect accessible vehicles as they tend to be heavier than domestic vehicles.</p>

Proposal	Equalities Analysis
<p><i>Adopt the power to remove vehicles in exceptional circumstances</i></p>	<p>The consultation results show that fewer 'Females' and 'Non White British' people were in agreement with this proposal. A high number of '45s – 65s', 'Males' and 'Disabled' People were in agreement with this proposal. Overall, a significant 80% of consultation respondents strongly agreed or tended to agree.</p> <p>There is no evidence emerging, from either consultation or research conducted, to indicate that this proposal would have any negative impact upon any protected characteristic group.</p>

Overall, equalities analyses can often cite the protected characteristic of Disability as a key equalities consideration to be taken account of when dealing with parking issues. In this instance, it should be noted that the full set of consultation results show a highly significant positive response emerging from Disabled People.

SECTION 4 – OUTCOMES

Outcome	Your response	Reason(s) and Justification
Outcome 1: No major change required.	<input type="checkbox"/>	
Outcome 2: Adjustments to remove barriers or to better promote equality have been identified.	<input checked="" type="checkbox"/>	<p>Implementation of the enforcement policy should continue but consideration needs to be given to the concerns raised during the consultation, especially in relation to the introduction of any regular and systematic enforcement of weight restrictions in car parks.</p> <p>Additionally the service plans to implement effective customer satisfaction and equalities monitoring and provide Disability Equality Training for staff.</p>
Outcome 3: Continue despite having identified potential for adverse impact or missed opportunities to promote equality.	<input type="checkbox"/>	
Outcome 4: Stop and rethink.	<input type="checkbox"/>	

List the actions you will take as a result of this EqIAA.

- Following the results of the consultation a revised enforcement policy will be placed in front of Committee for determination. This revised policy will take into account the responses to the policy consultation.
- Parking Services will implement customer satisfaction monitoring specifically including equalities monitoring information.
- The Parking Services team will attend a focussed Disability equality Training session.

SECTION 5 – EqIAA EVIDENCE

13. List and attach the evidence you have which shows how you have systematically considered equality impact.

- Consultation results
- Review of the legislation and guidance:
- Traffic Management Act 2004
- The Civil Enforcement of Parking Contraventions (England) General Regulations 2007
- SI 2007/3483
- The Civil Enforcement of Parking Contraventions (Approved Devices)(England) Order 2007
- SI 2007/3486
- Traffic Management Act: Secretary of State Guidance to Local Authorities on Civil Enforcement of Parking Contraventions Dft 28 Feb 2008
- Operational Guidance to Local Authorities: Parking Policy & Enforcement. 25 March 2008
- Office of Surveillance Commissioners Procedure & Guidance Dec. 2008
- Civil Traffic Enforcement – Certification of Approved Devices Version 1. 28 Feb 2008
- Traffic Signs Regulations & General Directions SI 2002/3133